

1 KEVIN O'ROURKE  
2 SOUTHWELL & O'ROURKE, P.S.  
3 Attorneys at Law  
4 960 Paulsen Center  
5 W. 421 Riverside Avenue  
6 Spokane, WA 99201  
7 (509) 624-0159

8 UNITED STATES BANKRUPTCY COURT  
9  
10 IN AND FOR THE EASTERN DISTRICT OF WASHINGTON

11 In re:

12 **DIGIDEAL CORPORATION,**

13 Debtor.

No.: **17-00449-FPC11**

Chapter 11

**NOTICE OF DEBTOR'S MOTION  
PURSUANT TO 11 U.S.C. §105(a) AND  
§366(b) FOR DETERMINATION THAT  
ADEQUATE ASSURANCE HAS BEEN  
PROVIDED TO UTILITY COMPANIES  
AND SHORTEN OBJECTION PERIOD**

14 TO: Creditors and other parties in interest listed on the Master Mailing List;  
15 TO: Keith A. Trefry, Paine Hamblen LLP, Attorney for Creditor Seaport V LLC  
16 requesting special notice;  
17 TO: Gary Dyer, Assistant Attorney for United States Trustee;  
18 TO: Avista Utility Company;  
19 TO: Scott Morris, Chairman of the Board, President, and CEO of Avista Utility  
20 Company;  
21 TO: Integra; and  
22 TO: Marc Willency, CEO and Director of Integra

23 **PLEASE TAKE NOTICE** that Debtor has filed a Motion with the Court  
24 requesting an Order determining that adequate assurance has been provided to Utility  
25 Companies Avista and Integra (hereinafter "Utility Companies"). Pursuant to 11 U.S.C.  
§366, a utility may alter, refuse, or discontinue service if neither the Trustee nor the  
Debtor, within twenty (20) days after the date of the order for relief, furnishes adequate  
assurance of payment, in the form of a deposit or other security, for service after such  
date. On request of a party in interest and after notice and hearing, the Court may order  
reasonable modification of the amount of the deposit or other security necessary to  
provide adequate assurance of payment. On or about February 21, 2017, Debtor  
tendered to each of the Utility Companies the sum of \$150.00, as and for a form of  
deposit ("Deposit"). Debtor believes this Deposit satisfies the requirements of 11 U.S.C.  
§366.

Certificate of Service-1

**SOUTHWELL & O'ROURKE, P.S.**  
A PROFESSIONAL SERVICE CORPORATION  
ATTORNEYS AT LAW  
SUITE 960, PAULSEN CENTER  
WEST 421 RIVERSIDE AVENUE  
SPOKANE, WASHINGTON 99201  
TELEPHONE (509) 624-0159

**PLEASE TAKE FURTHER NOTICE** that Debtor has moved the Court for an Order shortening the time period to object to this notice from ten (10) days from the date of mailing this notice. The basis of Debtor's request for the shortened objection period is that all issues relating to Debtor's motion to extend period during which Utility Companies may not alter, refuse, or discontinue service to Debtor are immediately resolved.

**PLEASE TAKE FURTHER NOTICE** that you may object separately to Debtor's request to the extension of the period during which Utility Companies may not alter, refuse, or discontinue service to the Debtor or the shortening of the objection period.

**PLEASE TAKE FINAL NOTICE** that if you object to the above proposal/request, you must do so in writing setting forth specifically the nature and basis of your objection and serve the undersigned attorney for Debtor at 960 Paulsen Building, Spokane, Washington 99201, within ten (10) days from the date of mailing this notice. In addition, you must file the original of your objection with the Clerk of the United States Bankruptcy Court at 904 W. Riverside Avenue, Spokane Washington 99210 and serve or mail a copy to the United States Trustee at 920 W. Riverside, #593, Spokane, Washington 99201.

DATED this 9<sup>th</sup> day of March, 2017.

SOUTHWELL & O'ROURKE, P.S.

BY:/s/ Kevin O'Rourke  
KEVIN O'ROURKE, WSBA #28912

Date mailed: 3/9/17

## Certificate of Service-2

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